



Gas Pipeline Company, LLC

2800 Post Oak Boulevard
Houston, Texas 77056
713-215-2738

October 1, 2001

James L. Connaughton, Chairman
Council on Environmental Quality
Executive Office of the President
17th and G Streets NW
Washington, DC 20503

By e-mail to energytaskforce@ceq.eop.gov

Re: Energy Task Force-Executive Order 13212
Request for Comments [FR Doc. 01-20914]

Dear Mr. Connaughton,

Williams Gas Pipeline Company, LLC (WGP)¹ is engaged in the interstate transmission of natural gas and operates one of the largest pipeline systems in North America. To meet present and anticipated demands for natural gas, WGP has been proactive in proposing and constructing expansions of its existing pipelines and storage facilities. WGP's MarketLink and Sundance Projects, both presently under construction on its Transco line, will provide additional volumes to the Atlantic seaboard before the onset of winter. WGP's emergency expansion on its Kern River line, in response to the California energy crisis, has been providing needed additional service to California since mid-summer. WGP has proposed and is developing many more such expansion projects as well as upgrading its existing facilities in growing population centers to comply with Federal pipeline safety standards and to maintain maximum service and reliability.

It is estimated that more than 90 percent of planned new power generation facilities in the United States will be fueled by natural gas and that over 30,000 miles of new transmission pipelines will be needed to transport this fuel gas. This will entail expansion on many existing pipeline systems as well as developing several

¹ Williams Gas Pipeline Company, LLC comprises Transcontinental Gas Pipe Line Corporation, Northwest Pipeline Corporation, Kern River Gas Transmission Company, Texas Gas Transmission Corporation, and Williams Gas Pipelines Central, Inc.

entirely new pipelines. The planning, siting, scoping, design and analysis of environmental issues required under the National Environmental Policy Act (NEPA) required to support the expansion of the North American pipeline infrastructure will require the cooperation and collaboration of many federal departments and agencies including, among others, the Federal Energy Regulatory Commission (FERC), the Environmental Protection Agency (EPA), and the Departments of Interior (DOI), Defense (DOD), Commerce (DOC), Transportation (DOT) and Agriculture (DOA). This cooperation and collaboration must also extend to state and local regulatory and resource management agencies as much permitting and land use planning occurs at this level. In fact, several Federal programs are administered or supported by state and local agencies including those prescribed under the Clean Air Act, the Clean Water Act and the Coastal Zone Management Act.

Considering the array of federal, state and local programs and authorities which apply to interstate pipeline projects, coordination as much as collaboration is needed. The Energy Task Force will need to consider how best to coordinate the diverse data and human resources available at all levels of government. WGP suggests that CEQ include FERC experts in prominent management and staff capacities on the Energy Task Force, especially since at least two of the eight functional categories to be represented on the task force are regulated by the FERC and that the FERC has played a key role as Lead Federal Agency on interstate pipeline and hydropower projects. As Lead Federal Agency, the FERC has facilitated and coordinated outreach to federal and state land and resource management agencies. Through the experience of its staff and its considerable data resources, the FERC can provide the Energy Task Force insight on prioritization of energy projects, identification of impediments to agency decision-making and recommendations on the means of expediting clearances, permits and approvals.

Earlier this year, the staff of the FERC recognized that certain efficiencies could be realized in the development of environmental records of decision required by NEPA for major interstate pipeline projects, i.e., those actions requiring the preparation of an Environmental Impact Statement (EIS). Those efficiencies are available to interstate pipeline project proponents prepared to engage an environmental contractor to work under the direct supervision of FERC Staff and to participate with FERC Staff and the environmental contractor in collaborating with federal, state and local regulatory and resource management agencies to identify and resolve design, environmental, safety and land use issues prior to the actual submittal of an application for Certificate of Public Convenience and Necessity. To date this process has been implemented on only one project, the proposed Kern River Expansion 2003 on WGP's Kern River line; this project would deliver significant new volumes of natural gas to California needed to fuel new power generation facilities. WGP recommends that the Energy Task Force utilize such an approach on other energy transmission corridor projects as a means of streamlining decision-making and perhaps creating a model for administrative changes relative to interstate pipeline or electric transmission projects.

WGP believes that it is important that the energy industry and Federal officials disseminate information on the national energy infrastructure to governors, state utility commissions and state resource management agencies to solicit their participation in the development of coordinated, regional planning to meet foreseeable energy needs. Such planning would include the identification of energy zones or corridors or at least a consistent process for developing sites or aligning transmission facilities. Special attention must be given to the necessity of creating or expanding facilities in high growth regions with under-developed energy transmission infrastructure such as the Northeast, Florida and California.

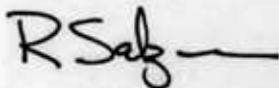
Further, WGP believes that it is important that Federal and state officials frequently advise local representatives, through focused conferences or statements in the media, of the need to expand the national, regional and local transmission and distribution infrastructure. Knowledgeable statements about energy supply and demand scenarios by government experts and elected officials will help to counteract a default skepticism on the part of a lay public that inherently takes availability and reliability of utility service for granted.

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In closing, WGP appreciates the opportunity to submit these comments to CEQ and looks forward to further participation in exploring or experimenting with strategies and mechanisms for streamlining decision-making processes for energy projects. Should you have any questions or if WGP can be of further assistance please call me in Houston at 713-215-2738 or Judy Neason in Washington at 202-833-8994.

Respectfully submitted,

WILLIAMS GAS PIPELINE COMPANY, LLC

A handwritten signature in black ink, appearing to read "R Salzer", followed by a horizontal line.

Robert R. Salzer
Principal Environmental Scientist